

State of California

California Integrated Waste Management Board

Sludge Diversion Claim

To request diversion credit for the material type sludge when calculating your diversion rate, a jurisdiction must provide documentation to substantiate that the sludge diversion meets certain statutory conditions. Below is a list of questions that will assist in addressing the statutory conditions. Please complete, sign, attach appropriate documentation, and return this form to your Office of Local Assistance (OLA) representative at the address below. Please note that upon review of your request, OLA staff may ask for additional information if the information provided in the form is not clear. OLA staff will review your request as part of the Annual Report/Biennial Review process; therefore, it is recommended that this form be included as part of your Annual Report to the California Integrated Waste Management Board (Board.)

If you have any questions about this form, please call your OLA representative at (916) 341- 6199.

Mail completed documents to:

California Integrated Waste Management Board
Office of Local Assistance
1001 I Street, 9th Floor
P.O. Box 4025
Sacramento, CA 95812-4025

General Instructions:

Please complete both Section I and Section II, and Section III if applicable.

Section I: Jurisdiction Information and Certification			
I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:			
Jurisdiction Name City of Avalon		County Los Angeles	
Authorized Signature 		Title City Manager	
Type/Print Name of Person Signing Rob Clark	Date 1 July 2003	Phone (310) 510-0220	
Person Completing This Form (please print or type) F.D. Stout	Title Site Manager Seagull Sanitation	Phone (310) 510-2141	
Mailing Address PO Box 707	City Avalon	State CA	ZIP Code 90704
E-mail Address: rclark@catalinaisp.com			

State of California

California Integrated Waste Management Board

Section 2: Background

1. Was the material type sludge "normally disposed" of as of January 1, 1990 [14 CCR section 18720 (44)]?
☐ XX Yes. If yes, please attach documentation* and proceed to question 2 (*e.g. copy of table in SWGS showing sludge tons disposed in 1990).
☐ No. If no, **stop**. You may not claim sludge diversion credit [PRC Section 41781 (a)(2)(B)].
2. Is the facility generating sludge (waste water treatment plant, etc.) located within the boundaries of your jurisdiction?
☐ XX Yes. If yes, please provide address and go to Question 3.
☐ No. If no, **stop**. You may not claim sludge diversion credit.
Address of facility generating sludge:

125 Dump Road
Avalon, CA 90704

3. Is this tonnage claimed for diversion credit representative of the "typical" annual amount of sludge generated by the jurisdiction?
☒ X Yes. If Yes, attach documentation and proceed to Section 3. Documentation could include a letter from the wastewater treatment facility verifying this is annual tonnage.
☐ No. If No, you may not be able to claim the entire tonnage, please call your Office of Local Assistance representative.

Section 3: Sludge Diversion Facility/ Activity information

To claim sludge diversion credit, a jurisdiction must document that the activity used to divert sludge meets certain statutory criteria. A jurisdiction may use the model Sludge Diversion Facility Questionnaire provided by OLA staff to obtain this information from the facility, and then attach the completed questionnaire to its request.

1. Sludge tonnage diverted in 2002 from the City of Avalon was 220.46 tons.
2. What is the name and address/location of the facility where the sludge is being diverted?

Pebbly Beach Landfill
1 Dump Road
Avalon, CA 90704

3. Please describe the selected activity used to divert sludge; be as specific as possible (e.g. land spreading, alternative daily cover or other beneficial use at solid waste disposal facility, etc.). Information should describe the method used to divert sludge; application rates; frequency of application, etc.

The sludge is mixed with dirt in 25% sludge to 75% dirt ratio and used for ADC. Approximately 18 tons per month (220 tons per year) are received at the landfill. The sludge is brought weekly (about 4 tons per week) and it is immediately mixed with dirt and used for ADC on the day it is received.

State of California

California Integrated Waste Management Board

4. Please describe the monitoring program(s) that are in place to insure that the sludge diversion activity will not pose a threat to public health or the environment. Include inspection frequency, names of federal, state, or local agency(s) monitoring, inspecting, or regulating activity, the frequency of analysis of the sludge to verify it is not hazardous, and any systems in place to protect the public health or the environment. Please attach any supporting documentation concerning the analysis of the material.

United Water the operator of the Sewage Treatment Plant is responsible for having the sludge tested. The sludge is sent to an accredited laboratory who prepares an Annual Solids Analysis Report (see attached), and moisture content analysis is performed at the treatment plant on every load delivered to the landfill.

5. Has the sludge diversion activity received a permit or been identified under an existing permit, waste discharge requirements (WDR), or have other conditions been imposed by one or more of the following agencies specified in PRC Section 41781.1?

- (i) The State Water Board and the regional water boards.
- (ii) The State Department of Health Services.
- (iii) The State Air Resources Board and air pollution control districts and air quality management districts.
- (iv) The Department of Toxic Substances Control.

☒ Yes. If Yes, go to number 6.

☐ No. If No, go to number 7.

6. Include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirements, or other imposed conditions. If the facility is a permitted solid waste disposal facility, include the Local Enforcement Agency name and facility's SWIS number.

Agency	Number or Agency Code of Permit, WDR, or other condition
California Integrated Waste Management Board	SWIS No. 19-AA-0061
Regional Water Quality Control Board	RWQCB Order R4-2002-0058
LACDHS	SWIS No. 19-AA-0061
LACRP	Case No. 96-162 (4)

7. Attach written certification from the agent(s) responsible for implementing the sludge diversion activity that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request.



City of Avalon

Santa Catalina Island

July 3, 2003

Seagull Sanitation
Pebble Beach Landfill
1 Dump Road
Avalon, CA 90704

Dear Facility Manager:

This letter is a request for information on your facility's processing/diversion of sludge material received from the City of Avalon, Los Angeles County unincorporated area of Avalon. California Integrated Waste Management Board (CIWMB) statutes and subsequent regulations require that jurisdictions requesting AB 939 diversion credit for sludge must provide specific information and certification to the CIWMB concerning the re-use or diversion of this material type. The information required is as follows:

- 1.) Description of the selected diversion alternative(s).
- 2.) Description of monitoring program(s) that are in place or which will be established to insure that the sludge diversion will not pose a threat to public health or the environment.
- 3.) Written certification from the agent(s) responsible for implementing the sludge diversion program that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request.
- 4.) If the sludge diversion activity receives a permit or is identified under an existing permit, waste discharge requirements, or has other conditions imposed by one or more of the agencies specified in question 4 of the attachment, include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirement, or other imposed conditions.

Administration / Finance
Public Works
P.O. Box 707
Avalon, CA 90704
310 510-0220
Fax 310 510-0901

Harbor Department
P.O. Box 1085
Avalon, CA 90704
310 510-0535
Fax 310 510-2640

Fire Department
P.O. Box 707
Avalon, CA 90704
310 510-0203
Fax 310 510-0104

Community Services
P.O. Box 1980
Avalon, CA 90704
310 510-1987
Fax 310 510-9528

Planning / Building
Capital Improvements
P.O. Box 707
Avalon, CA 90704
310 510-0220
Fax 310 510-0901

The questions on Attachment A of this letter address the information required by the CIWMB. Attached is a copy of the relevant statutes and regulations that define requirements for claiming diversion credit for sludge. Please complete the questionnaire, attach any documentation, sign the certification, and return them to:

Robert F. Clark
City of Avalon
P. O. Box 707
Avalon, CA 90704

Thank you in advance for your prompt assistance in this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Clark", written in a cursive style.

Robert F. Clark
City Manager

Sludge Diversion Facility Questionnaire

Name of facility diverting sludge:

Pebbly Beach Landfill

Facility's geographic address (include jurisdiction, e.g., within City or County unincorporated limits):

Seagull Sanitation

PO Box 295

1 Dump Rd

Avalon, Ca 90704

Location/address of verifiable records that answers are based upon:

Seagull Sanitation

PO Box 295

1 Dump Rd

Avalon, Ca 90704

Facility or Operations manager contact name/phone number:

Mr. F. D. Stout

(310) 510-2141

1. Tonnage of sludge received by the facility in 2002 (year) from the City of Avalon was 220 tons.
2. Please describe the selected activity used to divert sludge, be as specific as possible (e.g., land spreading, alternative daily cover or other beneficial use at solid waste disposal facility, etc.). Information should describe the method used to divert sludge (e.g., application rates, amount of application, frequency, etc.).

The sludge is mixed with dirt in 25% sludge to 75% dirt ratio and used for ADC.

Approximately 18 tons per month (220 tons per year) are received at the landfill. The sludge is brought weekly (about 4 tons per week) and it is immediately mixed with dirt and used for ADC on the day it is received.

3. Please describe monitoring program(s) that are in place to insure that the sludge diversion activity will not pose a threat to public health or the environment.

Include inspection frequency, names of federal, state, or local agency(s) monitoring, inspecting, or regulating activity, the frequency of analysis of the sludge to verify it is not hazardous, and any systems in place to protect the public health or the environment. Please attach any documentation confirming the analysis of the sludge material.

The LARWQCB inspects the treatment plant twice per year. Sludge is sent out annually for analysis according to EPA requirements. Sludge analysis reporting is submitted to EPA Region 9 annually. (See attached 2002 Analysis Report)

Prior to any delivery to Pebbly Beach Landfill all moisture requirements are met.

4. Has the sludge diversion activity received a permit or been identified under an existing permit, waste discharge requirements (WDR), or have other conditions been imposed by one or more of the following agencies specified in PRC Section 41781.1?
 - (i) The State Water Board and the regional water boards.
 - (ii) The State Department of Health Services.
 - (iii) The State Air Resources Board and air pollution control districts and air quality management districts.
 - (iv) The Department of Toxic Substances Control.

☒XX Yes

If Yes, go to number 5.

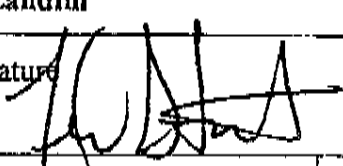
Sludge Diversion Facility Questionnaire

☐ No If No, go to number 6.

Include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirements, or other imposed conditions. If the facility is a permitted solid waste disposal facility, include the Local Enforcement Agency name and facility's SWIS number.

Agency	Number or Agency Code of Permit, WDR, or other condition
California Integrated Waste Management Board	SWIS No. 19-AA-0061
Regional Water Quality Control Board	RWQCB Order R4-2002-0058
LACDHS	SWIS No. 19-AA-0061
LACRP	Case No. 96-162 (4)

☐ Attach written certification from the agent(s) responsible for implementing the sludge diversion activity that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request.

Facility Information and Certification			
I certify under penalty of perjury the sludge diversion activity or reuse meets all applicable requirements of state and federal law, that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:			
Facility Name Seagull Sanitation Pebble Beach Landfill		County Los Angeles	
Authorized Signature 		Title Site Manager	
Type/Print Name of Person Signing F.D. Stout	Date 1 July 2003	Phone (310) 510-2141	
Person Completing This Form (please print or type) F.D. Stout	Title Site Manager	Phone (310) 510-2141	
Mailing Address PO Box 295	City Avalon	State CA	ZIP Code 90704
E-mail Address: <u>stoutf@repsrvofla.com</u>			

Sludge Diversion Facility Questionnaire

Public Resources Code Sections

41781.1.

- (a) Prior to determining that the diversion of sludge may be counted toward the diversion requirements established under Section 41780, but within 180 days of receiving such a request, the board shall do both of the following:
- (1) Make a finding at a public hearing, based upon substantial evidence, that the sludge has been adequately analyzed and will not pose a threat to public health or the environment for the reuse which is proposed.
 - (A) Except as provided in subparagraph (B), prior to making the finding required to be made pursuant to this paragraph, the board shall consult with each of the following agencies, and obtain their concurrence in the finding, to the extent of each agency's jurisdiction over the sludge or its intended reuse:
 - i. The state water board and the regional water boards.
 - ii. The State Department of Health Services.
 - iii. The State Air Resources Board and air pollution control districts and air quality management districts.
 - iv. The Department of Toxic Substances Control.
 - (B) If, prior to the board making the finding required to be made pursuant to this paragraph, an agency specified in subparagraph (A) issues a permit, waste discharge requirements, or imposes other conditions for the reuse of sludge, the agency shall have been deemed to have concurred in that finding.
 - (2) Establish, or ensure that one or more of the agencies specified in subparagraph (A) of paragraph (1) establishes, ongoing monitoring requirements which ensure that the proposed sludge reuse does not pose a threat to health and safety or the environment.
- (b) It is not the intent of this section to require the board, or the agencies listed in subparagraph (A) of paragraph (1) of subdivision (a), to impose additional requirements or approval procedures for sludge or sludge reuse applications, apart from the requirements and approval procedures already imposed by state and federal law. It is the intent of this section to require that the board determine that each sludge diversion, for which diversion credit is sought, meets all applicable requirements of state and federal law, and thereby provides for maximum protection of the public health and safety and the environment.

Title 14, California Code of Regulations (CCR) Sections

18775.2. Sludge Diversion.

(a) Jurisdictions that wish to claim diversion of waste type "sludge" shall submit a written request to the Board pursuant to PRC 41781.1. Within 45 days of receipt of a jurisdiction's request, Board shall notify the jurisdiction in writing whether sufficient information has been included in the request to enable the Board to make findings pursuant to PRC Section 41781.1. Requests that are found by the Board to be incomplete, pursuant to the criterion set forth in this section, shall be revised by the jurisdiction to correct any inadequacy. The Board shall make the findings required by PRC Section 41781.1 at a public hearing no later than 180 days after receipt of a complete request for sludge diversion credit.

- (1) A request for allowing sludge diversion shall include the following information:

Sludge Diversion Facility Questionnaire

- (A) Description of the selected diversion alternative(s);
- (B) Projected annual quantity of sludge waste to be diverted through the year 2000;
- (C) Documentation that waste type "sludge" has been categorized, quantified and documented in the applicable "solid waste generation study" as defined in section 18722 of this chapter;
- (D) Written certification from the agent(s) responsible for implementing the sludge diversion alternative that the reuse meets all applicable requirements of state and federal law. Information upon which the above certification is based shall be made available to the Board upon request.
- (E) Description of monitoring program(s) that are in place or which will be established to insure that the sludge diversion alternative will not pose a threat to public health or the environment.
- (F) If the sludge diversion alternative receives a permit or is identified under an existing permit, waste discharge requirements, or has other conditions imposed by one or more of the agencies specified in PRC Section 41781.1, include the name of the agency(s) and identify the agency identification code or number for the permit, waste discharge requirements, or other imposed conditions.

Note:

Authority cited:

Section 40502, Public Resources Code.

References:

Section 41780 and 41781.1, Public Resources Code.

18720. Definitions.

(a) (69) Sludge.

"Sludge" means residual solids and semi-solids resulting from the treatment of water, waste water, and/or other liquids. Sludge includes sewage sludge and sludge derived from industrial processes, but does not include effluent discharged from such treatment processes.



United Water Services
Avalon Wastewater Treatment Plant
Pebble Beach Road
P.O. Box 1810
Avalon, CA 90704
telephone 310.510.0731
facsimile 310.510.1847

June 10, 2003

To Whom It May Concern:

The City of Avalon has a contractual agreement with United Water Services to operate and maintain the cities wastewater treatment plant. Part of the operation of this facility is to process the sewage sludge. This sludge is aerobically treated, dried to less than 50% moisture and disposed of at the City of Avalon Landfill Site.

As the responsible operator of the City of Avalon wastewater treatment facilities, United Water Services certifies the annual tonnage of sewage sludge to be approximately 225 tons.

For additional information please contact me at your convenience.

Cordially,

A handwritten signature in dark ink, appearing to read "David O. Lanhardt".

David O. Lanhardt
Project Manager, Avalon
United Water Services

Avalon Annual Solids Analysis Year 2002**Major Constituents****Mercury TCLP (EPA 245.1)****Date Sampled: 8/28**

Constituent	Units	Results	MDL
Mercury	mg/L	ND	0.01

Avalon Annual Solids Analysis Year 2002**Major Constituents****TCLP Metals (EPA 6061B)****Date Sampled: 8/28**

Constituent	Units	Results	MDL
Arsenic (As) TCLP	mg/L	0.085	0.005
Barium (Ba) TCLP	mg/L	1.62	0.010
Cadmium (Cd) TCLP	mg/L	ND	0.005
Chromium (Cr) TCLP	mg/L	ND	0.010
Lead (Pb) TCLP	mg/L	ND	0.005
Selenium (Se) TCLP	mg/L	0.020	0.005
Silver (Ag) TCLP	mg/L	0.005	0.005

Avalon Annual Solids Analysis Year 2002**Major Constituents****TCLP Compounds (EPA 8061A)**

Date Sampled: 8/28/02

Constituent	Units	Results	MDL
Chlordane TCLP	mg/L	ND	0.01
Endrin TCLP	mg/L	ND	0.002
Heptachlor TCLP	mg/L	ND	0.001
Heptachlor Epoxide TCLP	mg/L	ND	0.001
Lindane TCLP	mg/L	ND	0.001
Methoxychlor TCLP	mg/L	ND	0.05
Toxaphene TCLP	mg/L	ND	0.01

Avalon Annual Solids Analysis Year 2002**Major Constituents****TCLP Compounds (EPA 8151)**

Date Sampled: 8/28/02

Constituent	Units	Results	MDL
2,4,5-TP (Silvex) TCLP	mg/L	ND	0.01
2,4-D TCLP	mg/L	ND	0.05

Avalon Annual Solids Analysis Year 2002**Major Constituents****TCLP Compounds (EPA 8260)****Date Sampled: 8/28/02**

Constituent	Units	Results	MDL
1,1 Dichloroethylene TCLP	mg/L	ND	0.005
1,2 Dichloroethane TCLP	mg/L	ND	0.005
Benzene TCLP	mg/L	ND	0.005
Carbon Tetrachloride TCLP	mg/L	ND	0.005
Chlorobenzene TCLP	mg/L	ND	0.005
Chloroform TCLP	mg/L	ND	0.005
Methylethylketone TCLP	mg/L	0.011	0.005
Tetrachloroethylene TCLP	mg/L	ND	0.005
Trichloroethylene TCLP	mg/L	ND	0.005
Vinyl Chloride TCLP	mg/L	ND	0.005

Avalon Annual Solids Analysis Year 2002**Major Constituents****TCLP Compounds (EPA 8270)**

Date Sampled: 8/28/02

Constituent	Units	Results	MDL
1,4 Dichlorobenzene TCLP	mg/L	ND	0.01
2,4 Dinitrotoluene TCLP	mg/L	ND	0.05
2,4,5 Trichlorophenol TCLP	mg/L	ND	0.05
2,4,6 Trichlorophenol TCLP	mg/L	ND	0.05
Cresol TCLP	mg/L	0.054	0.01
Hexachloro-1,3-butadiene TCLP	mg/L	ND	0.01
Hexachlorobenzene TCLP	mg/L	ND	0.01
Hexachloroethane TCLP	mg/L	ND	0.01
m,p-Cresol TCMP	mg/L	0.044	0.01
m-Cresol TCMP	mg/L	ND	0.01
Nitrobenzene TCLP	mg/L	ND	0.01
o-Cresol TCMP	mg/L	ND	0.01
p-Cresol TCMP	mg/L	ND	0.01

**Solid Report
2002****Avalon Annual Solids Analysis Year 2002****Major Constituents****TCLP Compounds (EPA 9095)**

Date Sampled: 8/28/02

Constituent	Units	Results	MDL
Free Liquid	%	ND	0.1

**United Water
City of Avalon
Solids Report
2002**

SMR 4.8**Avalon Annual Solids Analysis Year 2002****Major Constituents****Moisture (Oven Method)**

Date Sampled: 8/28/02

Constituent	Units	Results	MDL
Moisture	%	70	NA